

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JEFFREY PIAZZA,

Defendant.

NO. 3:09-CR-390

FILED
SCRANTON

DEC 01 2009

PER

DEPUTY CLERK

I N F O R M A T I O N

THE UNITED STATES ATTORNEY CHARGES:

18 U.S.C. § 1341
(Mail Fraud)

1. From in or about June 2006, the exact date being unknown, to in or about February 2009, in the Middle District of Pennsylvania and elsewhere, the defendant,

JEFFREY PIAZZA,

aiding and abetting other persons, and aided and abetted by other persons, devised and intended to devise a material scheme and artifice to defraud and to obtain money and property of the Wilkes-Barre Area Career and Technical School (hereinafter referred to as "the Career and Technical School") by means of false and fraudulent pretenses, representations and promises.

2. At all times pertinent to this Information, the defendant JEFFREY PIAZZA was employed at the Career and Technical School. During part of the time alleged in this Information, he was employed as technology coordinator. The defendant JEFFREY PIAZZA, together with other persons, orchestrated a material scheme and artifice to defraud by which JEFFREY PIAZZA obtained thousands of dollars in hidden "kickbacks" paid to him by a vendor who sold

technology-related equipment to the Career and Technical School.

3. It was part of the scheme and artifice to defraud that the defendant JEFFREY PIAZZA recommended a vendor to the Career and Technical School for the purpose of supplying technology-related equipment to the Career and Technical School. It was further a part of the scheme and artifice to defraud that the vendor, through material misstatements and material omissions made with the intent to defraud the Career and Technical School, caused representatives of the Career and Technical School to believe that the price of the technology-related equipment provided by the vendor was fair and reasonable when, in fact, the price of the technology-related equipment had been artificially and materially inflated by the vendor so the vendor could pay a hidden "kick-back" to defendant JEFFREY PIAZZA to improperly reward JEFFREY PIAZZA for facilitating the purchase of the technology-related equipment by the Career and Technical School.

4. It was further a part of the scheme and artifice to defraud that the defendant JEFFREY PIAZZA and the vendor caused false records to be created and maintained by the vendor. Some of the false records were created by a third person, at the direction of the defendant JEFFREY PIAZZA, to mask the vendor's hidden payments to defendant JEFFREY PIAZZA and to make it appear as if the vendor paid the third person for providing training, consulting and technical services in connection with the technology-related equipment sold by the vendor to the Career and Technical School.

5. For the purpose of executing the above-described material

scheme and artifice to defraud and to obtain money and property of the Career and Technical School by means of false and fraudulent pretenses, representations and promises, the defendant JEFFREY PIAZZA and the vendor, on separate occasions during calendar years 2007, 2008 and 2009, caused to be deposited in the United States mails in the Middle District of Pennsylvania, and caused to be delivered by the United States Postal Service to the Internal Revenue Service, false and fraudulent forms 1099-MISC. The forms 1099-MISC falsely reported the payment of "nonemployee compensation" to a third person who, in fact, had not performed any services for the vendor and who was not entitled to receive any compensation from the vendor.

In violation of Title 18, United States Code, §§ 2 and 1341.

DATE: December 4, 2009

Dennis C. Pfannen-schmidt (Wife)
DENNIS C. PFANNENSCHMIDT
UNITED STATES ATTORNEY